Attachment A

Draft Street safety camera program code of practice (changes marked up)

CITY OF SYDNEY

Street Safety Camera Program

Code of Practice

The City of Sydney acknowledges the Gadigal of the Eora Nation as the Traditional Custodians of our local area.

Contents

1. DEFINITIONS 3
2. INTRODUCTION & KEY PRINCIPLES 7
3. OVERVIEW 8
4. REVIEW OF AND CHANGES TO THE PROGRAM OR CODE OF PRACTICE 10
5. PURPOSE 11
6. MAJOR EVENTS 12
7. DEMONSTRATIONS AND PUBLIC RALLIES 13
8. NSW POLICE OPERATIONS 15
9. RESPONSIBILITIES OF THE CITY OF SYDNEY 15
10. RESPONSIBILITIES OF THE NSW POLICE 16
11. ACCOUNTABILITY 16
12. PUBLIC INFORMATION 17
13. ASSESSMENT OF THE CODE OF PRACTICE 18
14. MANAGEMENT OF THE CONTROL ROOM 18
15. CONTROL ROOM ACCESS ..... 20~~19~~
16. INFORMATION RECORDED AND REPORTED 20
17. RECORDED MATERIAL 21
18. CONTACT WITH THE NSW POLICE ..... 25~~24~~
19. INTEGRITY OF THE PROGRAM 25
20. APPROVAL HISTORY 26
21. SCHEDULE 1 CAMERA LOCATIONS ..... 28~~27~~
22. SCHEDULE 2 RESPONSIBLE OFFICERS ..... 33~~32~~
23. SCHEDULE 3 AUTHORISED PERSONS ..... 35~~34~~
24. SCHEDULE 4 FORMS ..... 36~~35~~
25. SCHEDULE 5 SYSTEM AND CAMERA ANALYTICS ..... 37~~36~~

1. DEFINITIONS

1.1. Audit

A systematic, independent, and documented verification process of objectively obtaining and evaluating audit evidence to determine whether specified criteria are met.

1.2. Australian Law Enforcement Agency or Investigation/Intelligence Authority

NSW and Interstate Police, Australian Federal Police, Australian Border Force, Australian Criminal Intelligence Commission and Australian Security Intelligence Organisation.

~~1.2.~~1.3. Authorised Person

A person acting in support of the operation of the Street Safety Camera Program (SSCP). Authorised persons are able to enter the control room at any time without formally requesting authorisation (See Schedule 3) .

1.4. Camera and Software Analytics

Artificial Intelligence (AI) either built into the camera operation or additional add-on software which is capable of:

Monitoring and alerting City of Sydney Security Operators to unusual behaviours such as:

i) Left object

ii) Removed object

iii) Direction of travel breach

iv) Abnormal behaviour (such as a large crowd suddenly gathering or running).

Feature set search tools which may include:

i) Male or female

ii) Adult or child

iii) colour to top or bottom

iv) hair colour

v) carrying a backpack or bag

vi) type and colour of motor vehicle

Any camera or software analytic technology used will not involve the use of biometric identification systems including facial recognition systems.

~~1.3.~~1.5. CCTV

Closed circuit television.

~~1.4.~~1.6. City Management

Functions for which the SSCP may be used during major events including monitoring crowd movements, cleansing operations, waste management, and emergency management.

~~1.5.~~1.7. Civilian

Any individual or representative of an organisation who is not a member of ~~the NSW Police~~an Australian Law Enforcement Agency or Investigation/Intelligence Authority or a Responsible Officer.

~~1.6.~~1.8. CCTV System

The system which operates the cameras and within which all recorded materials and information regarding their operation is recorded.

~~1.7.~~1.9. CCTV Database

The system into which all information regarding incidents viewed on the monitors located in the control room, operators' activities, transfer of vision, and access to the control room is entered.

~~1.8.~~1.10. Control Room

The Security and Emergency Management Operations Centre room where SSCP cameras are monitored.

~~1.9.~~1.11. Control Room Staff

Staff engaged by City of Sydney to perform duties for the SSCP, security operations, and emergency management.

~~1.10.~~1.12. General Intelligence Gathering.

Monitoring a particular person or location that is not linked to the investigation of an offence which is covered by the Code of Practice~~, rather than a standard incident, for the purpose of assisting Police or any other law enforcement agency with their activities~~.

~~1.11.~~1.13. Incident

~~1.11.1.~~1.13.1. Administrative Incident

An activity that relates to the management of the SSCP e.g., details of Control room visitors or operational faults.

~~1.11.2.~~1.13.2. Major Incident

An incident which includes the following:

~~i)~~vii) an earthquake, flood, wind, storm, or other natural event

~~ii)~~viii) an explosion

~~iii)~~ix) a fire

~~iv)~~x) a serious road accident

~~v)~~xi) a war like act

~~vi)~~xii) an act of terrorism

~~vii)~~xiii) a hijack

~~viii)~~xiv) a siege

~~ix)~~xv) a riot

~~x)~~xvi) any like occurrence considered to be extremely serious.

~~1.11.3.~~1.13.3. Standard Incident

An incident observed by staff, or is reported or broadcast by NSW Police, which includes the following:

i) Any situation within the area covered by the SSCP involving injury to a person as a result of an offence committed by others or any situation where injury or safety to a person is threatened, including self-harm or concern for a persons welfare.

Any situation involving the theft of property or serious damage to property.

This will include situations where a person is observed or reported:

i) carrying a weapon

ii) clearly distressed

iii) injured or in a medical emergency

iv) about to spring at another person from under the cover of a laneway, alcove, shadow or other cover

v) involved in a heated conversation

vi) pushing and shoving with another person

vii) attacking another person

viii) checking the contents of parked cars

ix) breaking glass or other potentially injurious objects

This will also include situations where a person of interest is being pursued by Police within the range of cameras for an offence within the purposes of the Program, and use of the cameras may assist Police, or there is a threat to Police or any other person during the pursuit.

~~1.12.~~1.14. Information Sharing

The City of Sydney will accept images, footage and information from the NSW Police so that it can be used as part of and in accordance with the purposes of the Street Safety Camera Program. NSW Police may also distribute City of Sydney SSCP images with other agencies for these purposes and in accordance with the protocols outlined in the Code of Practice.

~~1.13.~~1.15. Major Event

Any major cultural, celebratory or sporting event held in the public domain that:

i) Has a significant impact on the normal functioning of the city, for example, alters normal business or transport activities.

ii) Involves a significant increase in the normal volume of the pedestrian activity.

iii) Involves an additional risk to personal safety.

~~1.14.~~1.16. Monument of public significance

Any statue, building, plant, or other fixture that is of particular significance to the public in an architectural, religious, cultural or environmental sense. Examples of monuments of public significance include, but are not limited to:

i) ANZAC Memorial (Hyde Park)

ii) Cenotaph (Martin Place)

iii) Sydney Town Hall

iv) Places of worship

v) Queen Victoria Building

vi) Moreton Bay Figs (Hyde Park)

~~1.15.~~1.17. NSW Police Operation

From time to time, the NSW Police may need to conduct operations to prevent and/or respond to an escalation of ‘crimes against a person’, as defined in 6~~5~~.1.1 of the Code of Practice.

~~1.16.~~1.18. Log on credentials

Username and password issued to each individual control room staff member or City of Sydney Responsible Officer which will allow access to the camera operating equipment.

~~1.17.~~1.19. Responsible Officer

~~1.17.1.~~1.19.1. City of Sydney Responsible Officer:

A City of Sydney staff member involved in the management of the SSCP. City of Sydney Responsible Officers can enter the control room at any time without formally requesting authorisation (see Schedule 2).

~~1.17.2.~~1.19.2. NSW Police Responsible Officer

A member of the NSW Police who is responsible for authorising Police applications to view or obtain a copy of recorded materials (see Schedule 2).

~~1.18.~~1.20. Recorded materials

CCTV footage and photographs.

~~1.19.~~1.21. Serious criminal offence

Any offence ~~under the Crimes Act 1900~~ which attracts imprisonment of five years or more or life, and in particular (but not limited to):

i) Steal motor vehicle

ii) Steal from motor vehicle

iii) Other steal

iv) Break and enter

v) Malicious damage to property

vi) Firearm offences

vii) Receiving stolen goods

viii) Act of terrorism

ix) Assault

x) Robbery

xi) Offences under the Asio Act including, but not limited to:

a. Espionage

b. Sabotage

c. Politically motivated violence

d. Attacks of Australian defence systems

~~x)~~e. Acts of foreign interference

~~1.20.~~1.22. Serious Graffiti

Any act or acts of graffiti on monuments of public significance, or excessive and/or repetitive acts causing or likely to cause significant damage.

~~1.21.~~1.23. Street Safety Camera Program (SSCP)

The activities involved in the operation of the City of Sydney's public CCTV network.

2. INTRODUCTION & KEY PRINCIPLES

This Code of Practice contains the basic standards in accordance with which the SSCP will be operated.

The Code of Practice is based on 15 key principles. In each section the key principle is stated, followed by further explanatory information.

The key principles are as follows:

Principle 1

The SSCP will be operated fairly, within applicable law and only for the purposes for which it is established, or which are subsequently agreed in accordance with this Code of Practice.

Principle 2

The SSCP will be operated with due regard to the privacy and civil liberties of individual members of the public, including the rights to freedom of religious and political expression and assembly. The SSCP will not be used for the reporting of any intelligence on the expression of legitimate political or religious views by members of the public.

Principle 3

The public interest in the operation of the SSCP will be recognised by ensuring the security and integrity of operational procedures.

Principle 4

The City of Sydney has primary responsibility for compliance with the purposes and objectives of the SSCP, for the maintenance, management and security of the Program, and the protection of the interests of the public in relation to the Program.

Principle 5

As a partner to City of Sydney's SSCP, the NSW Police will act in accordance with the Code of Practice.

Principle 6

The City of Sydney will be accountable to the public for the effective operation and management of the SSCP.

Principle 7

The public will be provided with clear and easily accessible information in relation to the operation of the City of Sydney's SSCP.

Principle 8

Regular monitoring and evaluation of the SSCP will be undertaken to identify whether the purposes of the Program are being complied with and objectives are being achieved.

Principle 9

Staff employed to work in the SSCP control room, whether they be operators or managers, will meet the highest standards of probity.

Principle 10

Access to the SSCP control room will be restricted to qualified operating staff, support staff, and their managers and the control room will be protected from unauthorised access.

Principle 11

Information recorded will be accurate, relevant and not exceed that necessary to fulfil the purposes of the SSCP.

Principle 12

Information will be obtained fairly and in accordance with the privacy provisions of the Code of Practice.

Principle 13

The retention of, and access to, recorded material will be only for the purposes provided by this Code of Practice or applicable laws. Recorded material will be retained for ~~28~~ 30 days unless they are required in relation to the investigation of crime and/or for court proceedings. After ~~28~~ 30 days they will be recorded over.

Principle 14

Contact related to the SSCP between City of Sydney staff and the NSW Police Force, will be conducted strictly in accordance with the Code of Practice.

Principle 15

The SSCP will address the interests of all who may be affected by it~~,~~ and not be confined to the interests of the City of Sydney or the needs of the criminal justice system.

---

3. OVERVIEW

3.1. Street Safety Camera Program

3.1.1. The SSCP comprises the City's public closed-circuit television operation and is to be distinguished from the City's internal CCTV camera system. The SSCP covers areas in Kings Cross, Surry Hills, Sydney CBD, Glebe, and Woolloomooloo.

3.1.2. The SSCP is only one of several initiatives designed to assist in preventing crimes against the person in Sydney. However, it is recognised that such crime will never totally be prevented.

3.2. Code of Practice

3.2.1. The Code of Practice documents the 15 key principles of the program and details the day-to-day management procedures that support the governance of the program.

3.2.2. The Code of Practice is supplemented by a set of Standard Operating Procedures giving instructions on all aspects of the operation of the Program. These documents will be based on the Code of Practice to ensure that the principles and purposes on which the SSCP is based are realised.

3.2.3. Involvement in any aspect of the SSCP by relevant organisations or individuals will depend upon their willingness to comply with the Code of Practice and the Standard Operating Procedures.

3.2.4. All staff involved in the operation and management of the SSCP must understand the contents of the Code of Practice and are required to sign an acknowledgement of their understanding. The Code of Practice forms a key component of the training of control room staff and the successful operation of the Program relies on all staff involved in the program having a complete understanding of the Code of Practice and fully complying with its contents.

3.2.5. Instructions supplementing the Code of Practice may be issued from time to time.

3.2.6. The NSW Police may develop their own standard operating procedures to complement this document.

3.2.7. The Code of Practice remains the property of the City of Sydney. The Code of Practice will be available to the public to allow scrutiny of operational consistency with policy document.

3.2.8. The Code of Practice is subject to State and Federal law, including, but not limited to:

i) Privacy and Personal Information Protection Act 1998

ii) Government Information (Public Access) Act 2009

iii) Crimes Act 1900

iv) Security Industry Act 1997

v) Workplace Surveillance Act 2005

3.2.9. Additional copies of the Code of Practice may be obtained from:

Manager, Security and Emergency Management
City of Sydney
GPO Box 1591
Sydney NSW 2001

3.3. System Description

The Program is comprised of over 100 CCTV camera locations (see schedule 1) connected to a central control room. Images are transmitted live to observation screens monitored 24 hours a day by control room staff employed by the City of Sydney. All images are recorded and retained for ~~28~~ 30 days unless they are required in relation to the investigation of crime and/or for court proceedings.

The system is directly linked with several Metropolitan Police Area Commands to ensure instant communication and enable direct monitoring in certain circumstances such as an emergency.

Any Australian Law Enforcement Agency or Investigation/Intelligence Authority who is provided with access to SSCP camera feeds will have a signed Memorandum of Understandings with the City of Sydney that will include details of how access will be controlled and secured for the protection of the privacy of individuals.

The system may also include the integration of camera or software analytics to alert City of Sydney Security Operators of a potential incident occurring such as a sudden large crowd gathering or suddenly running from a location.

The system software analytics may also be introduced and used to significantly reduce the time taken to search for and locate people of interest wanted in relation to crime committed in accordance with the purpose of the program. This software would operate by searching for feature set matches within stored recordings of CCTV footage.

Further details on the governance and auditing of system and camera analytics can be found in Schedule 5.

3.4. Camera Type

3.4.1. All cameras are high definition, providing full colour, and may be PTZ (pan, tilt and zoom), fixed, or multi-sensor to enable effective coverage of the area of concern. An installation may include one or more cameras in a single location to provide coverage of the area.

3.4.2. All cameras are sourced from recognised industry leading manufacturers to ensure that state of the art technology has been used to provide maximum resolution and picture quality. The technology used will be regularly reviewed to ensure the most up to date equipment appropriate to the purposes of the SSCP is used.

3.5. Camera Locations

3.5.1. Cameras are installed in those areas of the city that are subject to a high incidence of crimes against the person. These locations are initially determined on the basis of:

i) Crime statistics provided by the NSW Police and the Bureau of Crime Statistics and Research

3.5.2. Proposed locations for CCTV and are assessed against the following criteria:

i) impact on the privacy of individuals and groups

ii) the potential for crime to be displaced to other areas

~~iii)~~i) the availability of supporting infrastructure and feasibility of installing additional infrastructure

~~iv)~~ii) the cost of installation and the availability of funding

3.5.3. To avoid unwarranted major intrusion into privacy, cameras will not be installed in predominantly residential areas.

3.5.4. The number and location of cameras may vary from time to time. The current approved camera locations are detailed in (Schedule 1).

3.5.5. Any additional cameras locations must be approved by Council in accordance with the section 4.2.

3.6. Location of monitoring and recording equipment.

3.6.1. Control room staff and monitoring equipment are located at:

- Security and Emergency Management Control Room.

Secondary monitoring equipment is located at:

- Police Operations Centre (Approved major events and Police operations only)
- NSW Police Area Commands

3.7. Ownership of the Street Safety Camera Program

The City is the owner of the SSCP and retains ownership of and has copyright of all equipment, recorded material and documentation pertaining to the program. The responsibilities of the City in relation to the system are outlined in section 9.

3.8. Partners in the Street Safety Camera Program

The NSW Police are a partner in the SSCP. The responsibilities of the NSW Police in relation to the program are outlined in section 10.

---

4. REVIEW OF AND CHANGES TO THE PROGRAM OR CODE OF PRACTICE

4.1. Review of the Code of Practice

The Code of Practice will be reviewed every two years by the Manager, Security and Emergency Management in consultation with the SSCP Working Group.

4.2. Changes to the Code of Practice

4.2.1. Changes to the Code of Practice or Standard Operating Procedures will be referred to the SSCP Working Group for assessment of the policy implications and consistency with the principles of the program.

4.2.2. A minor change to the SSCP or Code of Practice may be made with the agreement of both the Lord Mayor and the Chief Executive Officer. Any such changes will be advised to all other Councillors. A minor change is a change which may be required for the purposes of adjustment of the Program or clarification of the Code of Practice. Examples of minor changes are a change to the wording of a section of the Code of Practice where its meaning might otherwise be ambiguous or the relocation of a camera in an area.

4.2.3. A major change to the SSCP or to the Code of Practice will take place only after consultation with relevant interest groups and upon the agreement of the Council of the City of Sydney. A major change is a change which will have a significant impact upon the operation of the program or the Code of Practice. For example, a change to the purposes

of program or a proposal to install additional permanent cameras may be considered major changes.

4.2.4. The consideration and/or introduction of any major change to the SSCP or to the Code of Practice will be included in the regular audit report (see section 11).

4.3. Approval in emergency situations

The Chief Executive Officer of the City of Sydney or their delegate must be advised of the use of the SSCP during emergency situations, such as a siege or bomb explosion. The Chief Executive Officer will immediately inform the Lord Mayor of a request to use the SSCP for such purposes and when approval was given.

4.4. Approval for use during major events

The Executive Director City Services must approve the temporary use of the SSCP for the purposes of city management during major events.

4.5. Approval for use during demonstrations and public rallies

The Lord Mayor and CEO must approve the use of the SSCP for the purposes of city management during demonstrations and public rallies.

4.6. Approval for use during police operations

The Lord Mayor and CEO must approve the use of the SSCP to support NSW Police Operations targeting offences within the scope of the program.

4.7. Approval under exceptional circumstances

The Lord Mayor and CEO may permit one-off use of the program outside the standard operating parameters in exceptional circumstances.

---

5. PURPOSE

5.1. Primary Purpose

The primary purpose of City of Sydney's SSCP is to assist in the prevention of crimes against the person, particularly the following:

i) armed robbery
ii) robbery with wounding
iii) robbery in company
iv) extortion
v) assault
vi) assault occasioning grievous bodily harm
vii) assault occasioning actual bodily harm
viii) sexual assault
ix) aggravated sexual assault

5.2. Secondary Purpose

The secondary purpose of the SSCP is to assist in the prevention of serious property related crime, particularly the following:

i) steal motor vehicle
ii) steal from motor vehicle
iii) other steal

iv) break and enter

~~v)~~i) malicious damage to property

~~vi)~~ii) firearm offences

~~vii)~~iii) receiving stolen goods

5.3. Program Objectives

The objectives of the SSCP are:

i) to reduce crime levels by deterring potential offenders

ii) to reduce fear of crime

iii) to increase perceptions of safety

iv) to help ensure a fast, effective Police response in emergency situations

v) to assist in the detection of offences as listed but not limited to 5.1 and 5.2

vi) to assist in the prosecution of offenders by providing Police with recorded material to be used for evidentiary purposes

vii) to help secure a safer environment for those people who live in, work in and visit the city

5.4. Temporary Cameras

Temporary cameras may only be installed for major events.

5.5. Area of Coverage

The SSCP will only be used to identify crimes occurring within the area covered by the Program.

5.6. General Intelligence Gathering

The SSCP will not be used for general intelligence gathering, which is defined as 'monitoring a particular person or location that is not linked to the investigation of an offence which is covered by the Code of Practice'.~~.~~

5.7. Minor Offences

The SSCP will not be used for minor offences, such as minor acts of graffiti, minor motor vehicle accidents, traffic offences, and public urination.

5.8. Workplace Surveillance

The SSCP will not be used for workplace surveillance.

5.9. Illegal Dumping

The City of Sydney does not install or use CCTV cameras for the purpose of monitoring for illegal dumping.

---

6. MAJOR EVENTS

6.1. Use of the Street Safety Camera Program during Mmajor ~~events~~Events

6.1.1. During major events, in addition to its usual functions, the SSCP may be used to assist in the management of:

i) crowd movements in relation to crowd safety and traffic/pedestrian flow

ii) cleansing and waste management

iii) emergency management

6.1.2. The major events for which the Program is currently used include, but are not restricted to:

- New Year's Eve
- Mardi Gras
- Sydney Half Marathon
- City to Surf
- Australia Day
- Vivid
- Anzac Day

6.1.3. The monitoring of individual/small group interactions for general intelligence gathering purposes is not permitted.

6.2. Approval of the use of the Street Safety Camera Program during major events

6.2.1. The Executive Director, City Services must approve temporary use of the SSCP for the purposes of city management during major events.

6.2.2. Should use of the SSCP be required for the purposes of city management during a major event, the NSW Police or Premiers Department must submit a written request to the City including:

i) the nature of the event

ii) the date of the event

iii) the times during which it is proposed the major event procedures apply.

6.2.3. Any request from the NSW Police or NSW Premiers Department to use the SSCP for the management of major events must be put in writing and forwarded to:

Executive Director, City Services
City of Sydney
GPO Box 1591
Sydney NSW 2001

6.2.4. It is the responsibility of the Manager, Security and Emergency Management to notify control room staff of the dates and times during which the SSCP will be used for the purposes of city management during a major event.

6.3. Operation of the Street Safety Camera Program during major events

6.3.1. For the duration of the major event, the SSCP will operate in accordance with usual operating procedures. However, the procedures outlined in this section will also apply.

6.3.2. At all times camera control will remain with control room staff.

6.3.3. For the duration of the event, a Police Area Commander, Region Commander or Inspector may request vision from the SSCP to assist in crowd management, traffic management, cleansing and waste removal.

6.3.4. Vision will be terminated immediately on the conclusion of the event for which the transfer of vision has been requested.

6.3.5. In circumstances where control room staff members are monitoring an incident involving, or potentially involving, an offence against the person, the use of the SSCP for this purpose will take precedence over the use of the Program for city management.

7. DEMONSTRATIONS AND PUBLIC RALLIES

7.1. Use of the Street Safety Camera Program during demonstrations and public rallies

7.1.1. During demonstrations and public rallies, in addition to its usual functions, the SSCP may be used to assist in the management of:

i) crowd movements in relation to crowd safety and traffic/pedestrian flow

ii) cleansing and waste management

iii) emergency management

7.1.2. The SSCP can only be used to manage demonstrations and public rallies when they:

i) have a significant impact on the normal functioning of the city, for example, interruption of business or transport activities

ii) involve a significant increase in the normal volume of pedestrian activity

iii) involve an additional risk to personal safety

7.1.3. The Lord Mayor and Chief Executive Officer may permit one-off use of the SSCP program outside of these parameters in exceptional circumstances.

7.1.4. The monitoring of individual/small group interactions for general intelligence gathering purposes is not permitted.

7.2. Approval of the use of the Street Safety Camera Program during demonstrations and public rallies.

7.2.1. The Lord Mayor and Chief Executive Officer must approve temporary use of the SSCP for the purposes of city management during demonstrations or public rallies.

7.2.2. Should use of the SSCP be required for the purposes of city management during a demonstration or public rally, the NSW Police or Premiers Department must submit a written request to the City including:

i) the nature of the demonstration or public rally

ii) the date of the demonstration or public rally

iii) the times during which it is proposed the demonstrations and rallies procedures apply

7.2.3. Any request from the NSW Police or NSW Premiers Department to use the SSCP for the management of demonstrations and rallies must be put in writing and forwarded to:

Executive Director, City Services
City of Sydney
GPO Box 1591
Sydney NSW 2001

7.2.4. It is the responsibility of the Manager, Security and Emergency Management to notify control room staff of the dates and times during which the SSCP will be used for the purposes of city management during a demonstration or public rally.

7.3. Operation of the Street Safety Camera Program during demonstrations or public rallies

7.3.1. For the duration of the demonstration or public rally, the SSCP will operate in accordance with usual operating procedures. However, the procedures outlined in this section will also apply.

7.3.2. At all times camera control will remain with control room staff.

7.3.3. For the duration of the demonstration or public rally, a Police Area Commander, Region Commander or Inspector may request vision from the SSCP to assist in crowd management, traffic management, cleansing and waste removal that may lead to public safety concerns for the event.

7.3.4. Vision will be terminated immediately on the conclusion of the demonstration or public rally for which the transfer of vision has been requested.

7.3.5. In circumstances where control room staff members are monitoring an incident involving, or potentially involving, an offence against the person, the use of the SSCP for this purpose will take precedence over the use of the program for city management.

8. NSW POLICE OPERATIONS

8.1. Use of the Street Safety Camera Program to support NSW Police Operations

8.1.1. From time to time, the NSW Police may request support from the SSCP during operations to prevent and/or respond to an escalation of 'crimes against a person'.

8.1.2. The monitoring of individual/small group interactions for general intelligence gathering purposes is not permitted.

8.2. Approval of the use of the Street Safety Camera Program for NSW Police Operations

8.2.1. The Lord Mayor and Chief Executive Officer must approve temporary use of the SSCP for use in NSW Police operations.

8.2.2. Should use of the SSCP be required to support NSW Police operations, the NSW Police must submit a written request to the City including:

i) the nature of the operation

ii) the date of the operation

iii) the times during which it is proposed the Police Operations procedures apply

8.2.3. Any request from the NSW Police to assist with Police operations must be put in writing and forwarded to:

Executive Director, City Services
City of Sydney
GPO Box 1591
Sydney NSW 2001

8.2.4. It is the responsibility of the Manager, Security and Emergency Management to notify control room staff of the dates and times during which the SSCP will be used for the purposes of NSW Police Operations.

8.3. Operation of the use of the Street Safety Camera Program for NSW Police Operations

8.3.1. For the duration of an operation, the SSCP will operate in accordance with usual operating procedures. However, the procedures outlined in this section will also apply.

8.3.2. At all times camera control will remain with control room staff.

8.3.3. Vision will only be transferred to the Police Operations Centre while a City of Sydney Responsible Officer is on duty.

8.3.4. The City of Sydney Responsible Officer will have the ability to control camera operations via a keyboard from the Police Operations Centre during the operation.

9. RESPONSIBILITIES OF THE CITY OF SYDNEY

9.1. The Code of Practice

The City of Sydney will be responsible for the introduction and implementation of the Code of Practice and for ensuring compliance with the principles contained within the Code.

9.2. Compliance with the Code of Practice

The City of Sydney will comply with the requirements for accountability set out in this Code of Practice.

9.3. Consultation and public information

The City of Sydney will consult with and provide information to the public about the operation of the SSCP and about any proposed changes to the Program or the Code.

---

10. RESPONSIBILITIES OF THE NSW POLICE

10.1. Reporting of incidents

Incidents that may involve or lead to a crime against the person or other serious threat to public safety~~, or other serious criminal offence~~, will be reported by the control room to an arranged NSW Police contact. The NSW Police will assess the situation and determine an appropriate response to the incident.

10.2. Responding to incidents

It is the responsibility of the NSW Police to respond to incidents identified on monitoring screens to the extent that its resources and priorities allow.

10.3. NSW Police Procedures

The NSW Police will implement its own operational procedures in relation to the SSCP to complement those developed by the City of Sydney.

10.4. Memorandum of Understanding

A Memorandum of Understanding in relation to the SSCP will be entered into by both City of Sydney and the NSW Police outlining in detail the respective roles of both parties. The Memorandum of Understanding and any variations to it, are to be approved by both the Lord Mayor and Chief Executive Officer and are to be circulated to all City of Sydney Councillors.

---

11. ACCOUNTABILITY

11.1. Internal Audit

11.1.1. The City's Internal Audit Unit will complete an ~~biennial~~ audit of the SSCP every four years in accordance with the Audit, Risk and Compliance Committee Charter and the Internal Audit Charter.

The audit may include, but is not limited to:

i) examination of control room logs (visitor logs, evidence logs, etc.)

ii) examination of the content of recorded material

iii) examination of electronic data records

iv) examination of applications (for view/release of recorded material and access to the control room)

v) observation of all equipment to check that it is in good working order

11.2. SSCP Working Group

The City will establish and provide support to a SSCP Working Group, comprised of representatives from the City of Sydney, NSW Police, and suitably qualified persons from organisations with an interest in the operation of the SSCP.

The functions of the SSCP Working Group are:

i) to provide an independent review and checking mechanism for the SSCP

ii) to promote public confidence in the SSCP by ensuring its operations are transparent to the public and undergoing independent scrutiny and review

iii) to contribute to the development of the scope of audit for the program

iv) to review any deviations from the Code of Practice or Standard Operating Procedures and monitor recommended actions that will safeguard the program from abuse

v) to review proposed changes to the SSCP for assessment of the policy implications

vi) to assist in the evaluation of the SSCP to identify if the purposes of the Program are being complied with and objectives are being achieved.

The City will provide resources to the Working Group so it can effectively fulfil its functions.

~~11.3. Audit Report~~

~~The City's Chef Internal Auditor will produce an audit report biennially on the operation, functioning, and management of the SSCP. This must include setting out any discrepancies or deficiencies uncovered in the audit. The report will be presented to the City's Audit, Risk and Compliance Committee within three months of the audit completion date.~~

~~11.4.~~11.3. Right of inspection

Both the Lord Mayor and the Chief Executive Officer, independently, have an unfettered right of inspection of all City facilities associated with external CCTV monitoring, including recorded material, files and registers. All such access will be recorded in the register, including the identity of accompanying persons.

11.4. Self-Assessment

A self-assessment of the Street Safety Camera Program mid-way through the internal audit cycle

11.5. Annual Report

An annual report will be completed summarising the activities of the program each year. The report will also include details of audit and review activities carried out through the year. These reports will be made available on the City of Sydney web site.

---

12. PUBLIC INFORMATION

12.1. CCTV Signage

In compliance with the NSW Government Guidelines, clearly visible signs that CCTV cameras are operating will be displayed at the perimeter of the area covered by the system and at other key points. These signs will:

i) inform the public that cameras are in operation

ii) allow people entering the area to make a reasonable approximation of the area covered by the system

iii) identify the City of Sydney as the owner of the system and provide contact details should further information be required

12.2. CCTV signage wording

The following wording is stated on SSCP signs:

"Street safety CCTV cameras are continuously recording in this area - for more information call 9265 9333 – www.cityofsydney.nsw.gov.au"

12.3. Availability of the Code of Practice

The Code of Practice will be made available to the public via the City's website. The availability of the Code of Practice will be publicised in connection with any publicity arranged for the SSCP.

12.4. Enquiries about the Street Safety Camera Program

Enquiries in relation to the City's SSCP and its operation can be made in writing to:

Chief Executive Officer
City of Sydney
GPO Box 1591
SYDNEY NSW 2001
Telephone (02) 9265 9333

13. ASSESSMENT OF THE CODE OF PRACTICE

13.1. Monitoring of the Street Safety Camera Program

The City, in consultation with the Audit, Risk and Compliance Committee and the SSCP Working Group, will periodically monitor the operation of the SSCP and implementation of the Code of Practice.

13.2. Evaluation of the Street Safety Camera Program

13.2.1. The City, in consultation with the SSCP Working Group, is responsible for ensuring that the SSCP is regularly subject to evaluation to identify whether its purposes are being complied with and whether objectives are being achieved. Resources committed to the system annually will include the cost of evaluation.

13.2.2. The evaluation will be conducted independently or carried out according to independently established criteria.

13.2.3. Evaluation of the SSCP will include as a minimum:

i) assessment of its impact upon crime

ii) assessment of its impact on neighbouring areas

iii) the views of the public on the operation of the Program

iv) operation of the Code of Practice and Standard Operating Procedures

v) whether the purposes for which the Program was established still exist

13.2.4. The results of the evaluation will be considered in the future functioning, management and operation of the Program.

14. MANAGEMENT OF THE CONTROL ROOM

14.1. Control Room staffing

14.1.1. The City will adopt:

i) Effective and fair systems of recruitment and selection of staff, including measures to ensure that the selection process provides for thorough validation of the suitability of candidates and regular review of the suitability of employed staff.

ii) A requirement that staff must be licensed, qualified at a suitable level on appointment and be capable of meeting in-service training requirements.

iii) A procedure outlining disciplinary proceedings (including dismissal) if they breach any of the provisions of the Code of Practice or Standard Operating Procedures and the City's Code of Conduct.

iv) A requirement of confidentiality which can be enforced during and after termination of employment.

v) Systems of monitoring and supervision that ensure compliance with the Code of Practice and Standard Operating Procedures.

14.1.2. A set of Standard Operating Procedures has been developed for control room staff.

14.2. Recruitment and selection of staff for the Control Room

14.2.1. The recruitment and management of control room staff is the responsibility of the ~~Security Operations~~ Manager, Security and Emergency Management.

14.2.2. All monitoring staff members must hold a minimum current class 1A licence, issued under the Security Industry Act 1997 (NSW) or as amended.

14.2.3. Control room staff will be subjected to a security operative licence check prior to commencing duty and every 12 months thereafter.

14.2.4. All new staff will be appointed on a probationary basis for the first six months of employment.

14.3. Control Room staff training

14.3.1. All staff will be required to undergo approved induction/familiarisation training during their probationary period.

14.3.2. All staff will be required to demonstrate their understanding of and capacity to operate the system alone prior to being granted permanent employment status.

14.3.3. Each new staff member on completion of their training is to be proficient in:

i) use and control of camera management systems

ii) use and control of recording systems

iii) identification and reporting of incidents

iv) knowledge of identified potential trouble spots

v) policy and procedures relating to recording of information

vi) exhibit handling and incident reporting

vii) emergency response and procedures

viii) accountability and confidentiality issues

ix) privacy issue

14.3.4. All staff will be subject to bi-annual performance appraisals and will be required to undergo additional training if necessary.

14.4. Confidentiality

14.4.1. All staff involved in the operation of the SSCP are required to sign a confidentiality agreement.

14.4.2. It is the responsibility of the ~~Security Operations~~ Manager, Security and Emergency Management to ensure that these agreements are signed prior to any person commencing employment.

15. CONTROL ROOM ACCESS

15.1. Access control procedures

15.1.1. Procedures have been put in place to ensure that access to the control room is restricted to operating staff and their managers and that the control room is protected from unauthorised access, except as provided in Clause 11.43.

15.1.2. The circumstances in which Police or other visitors are able to access the control room will be carefully controlled and outlined in this section of the Code of Practice and the Standard Operating Procedures.

15.1.3. The following persons are authorised to enter the control room:

i) City of Sydney Responsible Officers (see Schedule 2)

ii) authorised persons (see Schedule 3)

iii) authorised visitors (civilians when accompanied by a City of Sydney Responsible Officer)

iv) officers of Australian Law Enforcement Agency and Investigation/Intelligence authorities ~~the NSW Police~~ authorised to view or collect recorded materials

v) technical services and cleansing staff while in the presence of an authorised person.

15.1.4. Technicians must outline their details and sign into the visitor management system.

15.1.5. A City of Sydney Responsible Officer - Operational Management, or in their absence, a City of Sydney Responsible Officer - Strategic Management, is responsible for the authorisation of all visitors to the SSCP control room.

15.1.6. It is the responsibility of the City of Sydney Responsible Officer who has authorised the visit the control room to accompany those visitors while in the control room.

15.1.7. A register must be kept detailing all instances of access to the control room. All visitors will be required to sign-in to the visitor management system and follow all reasonable directives given by the City of Sydney Responsible Officer.

16. INFORMATION RECORDED AND REPORTED

16.1. Control and operation of cameras.

16.1.1. The locations of cameras will be clearly apparent to the public.

16.1.2. All use of cameras will accord with the purposes of the SSCP as outlined in the Code of Practice and the Standard Operating Procedures.

16.1.3. Cameras will not be used to look into private premises or residential properties.

16.1.4. No sound will be recorded in public places.

16.1.5. ‘Dummy’ cameras will not be used.

16.1.6. Operators of camera equipment will act in accordance with the highest standards of probity.

16.1.7. All control room staff will be made aware that recordings are subject to routine audit and that they may be required to justify their interest in a particular member of the public or premises.

16.1.8. Information collected by the SSCP is subject to the information protection principles of the Privacy and Personal Information Protection Act 1998.

16.1.9. Only authorised persons with the responsibility for monitoring and repairing control room equipment or a City of Sydney Responsible Officer shall have access to the operating controls of equipment located in the control room.

16.1.10. Cameras that are being actively monitored must be displayed on the main monitor wall. Cameras must be returned to auto patterns as soon as practical when not being utilised.

16.1.11. Police officers shall not be permitted to operate monitoring equipment located in the control room at any time (except during a 'major incident' – see section 18.3).

16.2. Intelligence Gathering

16.2.1. Control room staff will transfer intelligence in relation to standard incidents occurring during one shift to staff on the next shift to assist with the detection of offenders and to prevent further offences.

16.2.2. Except in the event of Major Incidents (~~1.12.2~~1.15), control room staff will not provide intelligence to Police or any other agency for any purposes outside the scope of the SSCP Code of Practice.

16.2.3. Australian Law Enforcement Agency or Investigation/Intelligence authorities~~Police~~ may supply photographs, written descriptions or recorded footage from other sources, for the purpose of locating any person of interest who is suspected as having been involved in the commission of an offence covered under the scope of the Program.

16.3. Incident Reports

16.3.1. Incident reports will be reviewed by the Responsible Officer on duty to determine whether any clarification of the Code of Practice or Standard Operating Procedures is necessary, or whether any additional training of staff is required. If required, the matter will be forwarded to the ~~Security Operations~~ Manager, Security and Emergency Management for review.

16.3.2. Incident reports are to be completed within 24 hours of the incident.

16.3.3. Any incident that, in the operator's opinion, may draw media attention or is of a serious nature is to be brought to the attention of the ~~Security Operations~~ Manager, Security and Emergency Management as soon as possible.

16.3.4. Any physical descriptors used by operators in completing incident reports are to be in accordance with the Standard Operating Procedures, Schedule 2.

---

17. RECORDED MATERIAL

17.1. Access and distribution of recorded material

17.1.1. Access to and use of recorded material will only take place:

i) in compliance with the needs of Australian Law Enforcement Agency or Investigation/Intelligence authorities ~~Police~~ in connection with the investigation of crime

ii) if necessary, for the purposes of legal proceedings or in compliance with applicable laws (such as the Government Information (Public Access) Act 2009 and the Privacy and Personal Information Protection Act 1998)

17.1.2. Recorded material will not be sold or used for commercial purposes or the provision of entertainment.

17.1.3. The showing of recorded material by the Australian Law Enforcement Agency or Investigation/Intelligence authorities ~~NSW Police~~ to the public or other agencies will be

allowed only in accordance with the needs of the Australian Law Enforcement Agency or Investigation/Intelligence authoritiesPolice in connection with the investigation of a crime or in any other circumstances provided by law.

17.1.4. Use of recorded material or photographs by the media should only occur to gain public information with respect to the identity of a person/s wanted in connection with a criminal investigation. Subject to the concurrence of the Australian Law Enforcement Agency or Investigation/Intelligence authorityPolice, the Chief Executive Officer may approve such releases after consultation with the Lord Mayor. In such cases the recognisable characteristics of other people in the footage shall be obscured.

17.1.5. Images shall not, under any circumstances, be used to publicise the existence or success of City of Sydney's SSCP.

17.1.6. Appropriate security measures will be taken against unauthorised access to, alteration, disclosure, accidental loss or destruction of recorded material.

17.1.7. Recorded material will be treated according to defined procedures to ensure continuity of evidence.

17.1.8. All recorded material will be subject to random inspection by the City's Audit Unit.

17.2. Holding of recorded material

17.2.1. All verbal requests for the holding of recorded material are to be made to a City of Sydney Responsible Officer.

17.2.2. The City of Sydney Responsible Officer will:

i) if appropriate, arrange to forward an application form to the person who has requested that the recorded material be held

ii) inform the person that if a completed application form is not received within 28 30 days the recorded material will be unavailable

iii) convey the request to the control room

17.3. Applications for the viewing and/or supply of a recorded material (general)

17.3.1. Access to and release of recorded material or photographs will only be permitted for reasons that are in accordance with the purposes of the SSCP or in compliance with applicable laws.

17.3.2. It is the responsibility of a City of Sydney Responsible Officer – Operational Management to sight and authorise every application for the viewing and release of recorded material. If for any reason a City of Sydney Responsible Officer – Operational Management is not available, a City of Sydney Responsible Officer – Operations may authorise an application.

17.3.3. The City of Sydney Responsible Officer responsible for authorising an application must:

i) determine the validity of the request and forward an application form (See Schedule 4 - Form 2 or 3) to the applicant if appropriate

ii) prior to forwarding the application form, explain to the applicant the conditions attached to the release of recorded material outlined in the Form 2 and 3 confidentiality clauses (see 17.3.4)

iii) authorise or reject the application

iv) forward the authorised application form to the control room

v) after completion of the review of requested recorded material, control room staff will notify the applicant of the result and arrange for viewing/collection of copied material

17.3.4. Form 2 and 3 confidentiality clause states that any copy of recorded material is released by City of Sydney on the understanding that the applicant:

i) acknowledges that the recorded material released is the property of the City of Sydney

ii) does not allow any copies of the recorded material to be produced, except under the provisions section 17.5.1(iv)

iii) does not publicly show or display any image or release it publicly without the prior written consent of the City of Sydney

iv) only uses the released information for the purposes stated on the application

17.3.5. All completed applications for the viewing or supply of recorded material should be forwarded to:

Security Operations ~~Manager~~
Security and Emergency Management Operations Centre
City of Sydney
GPO Box 1591
Sydney NSW 2001
Or by email to security@cityofsydney.nsw.gov.au

17.4. Civilian application for viewing and/or supply of a copy of recorded material

CCTV cameras have been installed in the Local Government Area to help authorities detect, prevent and prosecute crime.

The City of Sydney's Street Safety Camera Program Code of Practice stipulates that access to and use of recorded material can only take place;

i) In compliance with the needs of Police in connection with the investigation of crime

ii) If necessary, for the purpose of legal proceedings or in compliance with applicable laws (such as the Government Information (Public Access) Act 2009 and the Privacy and Personal Information Protection Act 1998)

Consequently, the City's CCTV footage is not publicly available.

There are two options open to obtaining CCTV footage taken by City cameras.

1. Request a copy of the CCTV footage issued to NSW Police in relation to their investigation of the incident
2. Make an application through the City's Information Access Team at informationaccess@cityofsydney.nsw.gov.au or on 02 9265 9066. They will explain how to make a request using the City's online form, or via email.

Attention is also drawn to the "Fact Sheet – Managing access to audio visual information under the GIPA Act" published by the NSW Information and Privacy Commission.

Contact details of the Commission are:

Email: ipcinfo@ipc.nsw.gov.au
Phone: 1800 472 679
Address: Level 15, McKell Building, 2-24 Rawson Place, Haymarket NSW 2000
Postal: GPO Box 7011, Sydney, NSW 2001

~~Where a person who is not a member of the NSW Police wishes to view or obtain recorded material~~ for the purposes of XX, ~~the following procedure must be followed:~~

~~i) the applicant must complete an Application to View or Obtain a Copy of Recorded Material by a Person Other Than a Member of the NSW Police (see Schedule 4 - Form 2)~~

~~ii) the completed application form must be forwarded by mail, or email to the SSCP control room (see 17.3.5)~~

~~iii) A City of Sydney Responsible Officer will then review the application in accordance with section 17.3~~

17.5. Australian Law Enforcement Agency or Investigation/Intelligence authority~~Police~~ application for viewing and/or supply of a copy of recorded material

Where a member of an Australian Law Enforcement Agency or Investigation/Intelligence authority ~~the NSW Police~~ wishes to view or obtain recorded material ~~for the purpose of a criminal investigation~~, the following procedure must be followed:

i) an~~-~~ Australian Law Enforcement Agency or Investigation authority ~~NSW Police~~ Responsible Officer must complete an on-line Application t~~T~~o View or Obtain a Copy of recorded material by a Member of ~~the~~ an Australian Law Enforcement Agency or Investigation/Intelligence authority ~~NSW Police~~ (See Schedule 4 - Form 3)

ii) the completed application must be forwarded to the SSCP control room (see 17.3.5)

iii) A City of Sydney Responsible Officer will then review the application in accordance with section 17.3

iv) the Australian Law Enforcement Agency or Investigation/Intelligence authority ~~NSW Police~~ may reproduce recorded footage or photographs for court purposes or for the purpose of review by the NSW Ombudsman in the oversight or investigation of complaints under Part 8A of the Police Act 1990 (NSW)

17.6. NSW Police application for the viewing and/or supply of a copy of recorded material (emergency)

17.6.1. At times it will not be possible for Police to wait to view recorded material. For example, if a serious standard incident has occurred and the Police need verification of the alleged offender's identity or physical features.

17.6.2. Where a member of the NSW Police wishes to view or obtain a copy of a SSCP recorded material in an emergency situation, the following procedure must be followed:

i) a Police Responsible Officer must contact a City of Sydney Responsible Officer and make a verbal request for a Police officer to view recorded material of an occurrence or for a copy of the recorded material to be released as a matter of urgency

ii) if the application is approved, the City of Sydney Responsible Officer will ~~contact~~ notify the control room staff and advise them that verbal authority has been given to allow the applicant Police officer to view or obtain a copy of the recorded material

iii) upon receipt of an application, staff will copy the evidence and contact the applicant to arrange collection

iv) the City of Sydney Responsible Officer who has given the verbal authorisation will ensure that he or she attends the control room at the earliest opportunity in order to sign Form 3 as final authorisation as soon as possible

17.7. Storage and destruction of recorded materials

17.7.1. All images are recorded and retained for ~~28~~ 30 days unless requested in accordance with 17.3 above.~~they are required in relation to the investigation of crime and/or court proceedings in which case footage will be retained for a further 7 days~~

17.7.2. All physical copies of recorded materials returned to the City will be destroyed in accordance with the Code of Practice.

17.7.3. All details on the Authorisation for the Destruction of Recorded Materials form (see Schedule 4 - Form 6) are to be completed by a City of Sydney Responsible Officer prior to the recorded materials being destroyed.

17.7.4. It is the responsibility of a City of Sydney Responsible Officer to collect the evidence from the control room and destroy it in the presence of a member of the Internal Audit Unit or its delegate.

17.7.5. Both the City of Sydney Responsible Officer responsible for destroying the recorded materials and the member of staff from the Internal Audit Unit or its delegate witnessing the destruction of the recorded materials are to sign the Authorisation for the Destruction of recorded materials form.

17.7.6. Destruction of recorded materials shall be by burning, shredding, erasure or other approved method.

18. CONTACT WITH THE NSW POLICE

18.1. NSW Police Involvement

18.1.1. NSW Police officers will not be permitted to remove any recorded material, operate recording equipment or have contact with any recorded material at any time unless under the terms of the Code of Practice, or subject to the execution of a search warrant or other relevant legal process.

18.1.2. Any change to the existing arrangements for NSW Police contact with and use of the system will amount to a major change to the Code of Practice and must be agreed to in accordance with the Code of Practice before being implemented.

18.1.3. Any involvement in the SSCP by NSW Police will be recorded by the City of Sydney and will be subject to audit.

18.2. Responding to standard incidents

18.2.1. Control room staff will contact NSW Police in relation to all offences against the person or public safety issue~~, and other serious criminal offences,~~ detected on CCTV. Control room staff should also contact Police in relation to most standard incidents.

18.2.2. Control room staff will transfer vision of a standard incident in progress to the relevant Police Area Command when required.

18.2.3. A replay of recorded footage may be transferred to the NSW Police to assist with the identification and apprehension of offenders and the identification of victims and witnesses.

18.3. Responding to major incidents

18.3.1. In the event of a major incident, a NSW Police Responsible Officer should contact a City of Sydney Responsible Officer and request that vision and/or control of the SSCP be transferred to the NSW Police.

18.3.2. During the major incident, staff will remain in the control room or attend the Police Operations Centre to provide assistance to the Police if required.

18.4. Responding to graffiti

18.4.1. Control room staff will not contact Police in relation to minor incidents of graffiti.

18.4.2. Control room staff will contact Police in relation to serious graffiti offences, and will transfer vision to the relevant Police Area Command when requested by a NSW Police Officer.

18.5. Responding to minor incidents

Control room staff will not contact Police in relation to minor incidents of graffiti, public urination or minor motor vehicle collisions.

19. INTEGRITY OF THE PROGRAM

19.1. Compliance of the Code of Practice

19.1.1. Prime responsibility for ensuring the Code of Practice is adhered to rests with the City of Sydney. This responsibility includes ensuring that breaches of the Code are investigated and remedied to the extent that breaches of the Code are within the ambit of City of Sydney's power to remedy.

19.1.2. Complaints in relation to any aspect of the management or operation of the system may be made in writing to:

Chief Executive Officer
City of Sydney
GPO Box 1591
SYDNEY NSW 2001

or by telephone on (02) 9265 9333

The Chief Executive Officer will inform the Audit Risk and Compliance Committee (see 11.1) in writing of these complaints.

The *Privacy and Personal Information Protection Act 1998* authorises the Information and Privacy Commission (IPC) to receive and investigate complaints about alleged violations of privacy. Any member of the public is entitled to lodge a complaint with the IPC. The contact details for the IPC are as follows:

Information and Privacy Commission

Level 15, McKell Building,
2-24 Rawson Place,
Haymarket NSW 2000
Tel: 1800 472 679
Email: ipcinfo@ipc.nsw.gov.au

19.1.3. The City will cooperate with the investigation of any complaint by the IPC.

19.2. Audit, Risk and Compliance Committee (ARCC)

19.2.1. Auditing of the City of Sydney's SSCP will be undertaken ~~biennially~~every four years.

19.2.2. The Internal Audit Unit shall provide a written report to the ARCC setting out any issues, discrepancies or deficiencies uncovered as part of the audit.

19.2.3. The Chief Executive Officer shall, upon receiving such a report, commence measures and actions as relevant to remedy identified deficiencies or inadequacies and to protect the privacy of the general community.

19.2.4. Recorded materials which contain images which are considered to breach the privacy of an individual or indicate misuse of the Program are to be placed into the custody of City of Sydney's internal auditors while the incident is investigated.

19.2.5. To protect the privacy of the community, no member of the ARCC will have the right to release information gathered as part of the audit process to any individual/organisation.

19.3. Internal Audit, Risk and Compliance investigation

Where a breach of the Code of Practice or Standard Operating Procedures occurs, or which involves the possibility of theft, misuse or abuse of City assets and resources, or alleged corrupt conduct of City staff, the matter will be investigated through the City's internal audit and governance mechanisms.

20. APPROVAL HISTORY

Stage	Date	Comment	TRIM Reference
Original Policy		Approved by CEO/Approved by Council	
Reviewed	3 August 2023	Minor updates of Police command names, visitor management recording and some contact details. Removed reference to storage of footage and master copies as all footage now transferred electronically. Update to forms used.	2023/397122 (Governance to populate)
Commence Review Date	June 2025		
Approval Due Date	(Date, month, year of when the next review of the policy is due to be finalised/ approved)		

21. SCHEDULE 1 CAMERA LOCATIONS

Camera #	Location	Precinct
201	Campbell Cove	The Rocks
202	George St x Hickson Rd	The Rocks
203	George St x Argyle St	The Rocks
204	Nurses walk	The Rocks
205	First Fleet Park	The Rocks
206	George St x Alfred St	Circular Quay
207	Pitt St x Alfred St	Circular Quay
208	Alfred St x Loftus St	Circular Quay
209	Alfred St x Phillip St	Circular Quay
210	George St x Hunter St	George Street
211	King St x York St	Retail Core
212	King St x George St	George Street
213	King St x Pitt St	Pitt Street Mall
214	Market St x George St	George Street
215	Market St x Pitt St	Pitt Street Mall
216	George St x Park St	George Street
217	George St x Druitt St	George Street
218	Sydney Square – top	Sydney Square
219	Sydney Square – bottom	Sydney Square
220	Pitt St x Park St	Retail Core
221	Park St – Hyde Pk South	Hyde Park South
222	College St x William St	Cook and Phillip Park
223	Cathedral St	Cook and Phillip Park
224	St Mary's Rd x Cathedral St	Cook and Phillip Park
225	Boomerang Walk (Yurong Parkway)	Cook and Phillip Park
226	Woolloomooloo walk	Cook and Phillip Park

Camera #	Location	Precinct
227	Hyde Park Pool of Reflection	Hyde Park South
228	Anzac Memorial - South	Hyde Park South
229	Museum Station	Hyde Park South
230	George St x Bathurst St	George Street Cinema
231	George St x Wilmot St	George Street Cinema
232	Kent St x Albion Lane	George Street Cinema
233	George St opp. Central St	George Street Cinema
234	George St x Liverpool St	George Street Cinema
235	Dixon St x Factory St	Haymarket
236	Sussex St x Goulburn St	Haymarket
237	George St x Goulburn St	George Street
238	George St x Campbell St	George Street
239	Harbour St x Little Hay St	Haymarket
240	Dixon St x Little Hay St	Haymarket
241	Dixon St x Hay St	Haymarket
242	Ultimo Rd x Thomas St	Haymarket
243	George St x Hay St	George Street
244	Pitt St x Hay St	Belmore Park
245	Belmore Park - Centre	Belmore Park
246	Eddy Ave – Belmore Park South	Belmore Park
247	Railway Square – George St x Quay St	Railway Square
248	George St x Regent St	George Street
249	Liverpool St. Central local court	Liverpool Street
250	Liverpool St x Pitt St	Liverpool Street
251	Martin Place x Elizabeth St	Martin Place
252	Martin Place x Castlereagh St	Martin Place
253	Martin Place x Pitt St	Martin Place

Camera #	Location	Precinct
254	Martin Place x George St	Martin Place
255	Pitt St Mall - Centre	Pitt Street Mall
256	Elizabeth St x Bathurst St	Hyde Park North
257	Elizabeth St, between Park St & Market St	Hyde Park North
258	Elizabeth St x Market St	Central Railway
259	Macquarie St x St James Rd	Central Railway
260	College St x Prince Albert Rd	Pitt Street Mall
261	Woolloomooloo Park	Woolloomooloo
262	Sussex St x Druitt St	Sydney Town Hall
263	Sussex St x Liverpool St	Haymarket
264	George St x Rawson Place	Haymarket
265	Margaret St x York St	Wynyard Station
266	Carrington St x Wynyard St	Wynyard Station
267	Oxford St x Wentworth St	Oxford Street
268	Oxford St x Pelican St	Oxford Street
269	Oxford St x Riley St	Oxford Street
270	Oxford St x Crown St	Oxford Street
271	Oxford St x Palmer St	Oxford Street
272	Oxford St x Taylor Sq	Oxford Street
273	Campbell St x Bourke St	Oxford Street
274	Pitt St x Bridge St	Pitt Street
275	George St x Grosvenor St	George Street
277	Bay St x Grose St	Glebe
276	Elizabeth St x Foveaux St	Central Railway
278	Broadway x City Rd	Glebe
279	Town Hall House A/H entry	Sydney Town Hall
280	Kent St x Druitt St	Sydney Town Hall

Camera #	Location	Precinct
281	Glebe Point Rd	Glebe
282	Darlinghurst Rd x Macleay St	Kings Cross
283	Springfield Mall	Kings Cross
284	Roslyn St x Kellett St	Kings Cross
285	Darlinghurst Rd	Kings Cross
286	Darlinghurst Rd x Bayswater Rd	Kings Cross
287	Bayswater Rd x Kellett St	Kings Cross
288	Bayswater Rd	Kings Cross
289	Darlinghurst Rd x Victoria St	Kings Cross
290	Darlinghurst Rd x William St	Kings Cross
291	William St x Forbes St	Kings Cross
292	William St x Crown St	Kings Cross
293	Park St x Castlereagh St	Hyde Park
294	Liverpool St x Castlereagh St	Liverpool Street
295	Pitt St x Goulburn St	Haymarket
296	Llankelly Place x Macleay	Kings Cross
297	Oxford St x Darlinghurst	Kings Cross
298	Wallamulla	Woolloomooloo
299	Butler Stairs (Trial)	Kings Cross
~~430~~	~~Bathurst St Taxi Rank~~	~~George St Cinema~~
~~452~~	~~Pitt St Taxi Rank~~	~~Martin Place~~
453	Martin Place Cenotaph East	Martin Place
454	Martin Place Cenotaph West	Martin Place
~~474~~	~~Pitt St North Taxi Rank~~	~~Pitt Street~~
488	Bayswater Road Taxi Rank	Kings Cross
489	Victoria St	Surry Hills
812	George/King 360	George Street

Camera #	Location	Precinct
814	George/Market 360	George Street
816	George/Park 360	George Street
820	Pitt/Park 360	Retail Core
830	George/Bathurst 360	George Street Cinema
834	George/Liverpool 360	George Street Cinema
837	George/Goulburn 360	George Street
843	George/Hay 360	George Street
845	Belmore Park 360	Belmore Park
850	Pitt/Liverpool 360	Liverpool Street
851	Martin Pl/Macquarie 360	Martin Place
855	Pitt St Mall 360	Pitt Street Mall
872	Oxford St/Taylor Square 360	Oxford Street
883	Springfield Mall 360	Kings Cross
886	Darlinghurst/Bayswater 360	Kings Cross
895	Pitt/Goulburn 360	Haymarket

22. SCHEDULE 2 RESPONSIBLE OFFICERS

22.1. City of Sydney Responsible Officers

22.1.1. City of Sydney Responsible Officers - Operations

The City of Sydney Responsible Officers – Operations are responsible for technical and operational matters pertaining to the SSCP. They should be contacted in relation to the following matters:

i) requests for the holding of recorded material

ii) obtaining copies of or viewing recorded material (both in emergency and non-emergency situations)

iii) requests for extensions of time for the return of recorded material

iv) visiting the SSCP control room

The City of Sydney Responsible Officer - Operations is:

Security Operations Coordinator

Phone: 9265 9178

22.1.2. City of Sydney Responsible Officers – Operational Management

The City of Sydney Responsible Officers - Operational Management are responsible for policy matters relating to the SSCP. They should be contacted in relation to the following matters:

i) use of the SSCP control room in relation to major incidents

ii) requests for the holding of recorded material

iii) obtaining copies of or viewing recorded material (both in emergency and non-emergency situations)

iv) requests for extensions of time for the return of recorded material

v) visiting the SSCP control room

vi) repair and maintenance of equipment

vii) recruitment and management of control room staff

viii) copies of the Code of Practice or Standard Operating Procedures

ix) amendments to or review of the Code of Practice or Standard Operating Procedures

x) evaluation of the SSCP

xi) auditing of the SSCP

The City of Sydney Responsible Officers – Operational Management are:

~~**Security Operations Manager**~~**Emergency Planning Manager**

Telephone: (02) 9265 9333

Contract and Systems Manager

Telephone: (02) 9265 9333

22.1.3. City of Sydney Responsible Officers – Strategic Management

The City of Sydney Responsible Officers – Strategic Management do not have any direct involvement in the day to day operation of the SSCP. If necessary, in an emergency they are able to make a decision in relation to any aspect of the SSCP. They should, however, only be contacted in an emergency and only after attempts to contact the above City of Sydney Responsible Officers have been unsuccessful.

The City of Sydney Responsible Officers – Strategic Management should only be contacted in the order in which they are listed:

Manager, Security and Emergency Management

Telephone: (02) 9265 9333

Executive Director, City Services

Telephone: (02) 9265 9333

Chief Executive Officer, City of Sydney

Telephone: (02) 9265 9333

22.2. NSW Police Responsible Officers

NSW Police Responsible Officers are permanent or acting senior officers including Sergeant's Police Area Commanders; Crime Managers; Crime Co-ordinators; Investigations Managers; and ~~Duty Officers~~Police Area Command Inspector.

22.3. Australian Law Enforcement Agency Responsible Officers

An Australian Law Enforcement Agency Responsible Officers are permanent or acting senior officers holding rank similar to NSW Police Responsible Officers including Sergeant's Police Area Commanders; Crime Managers; Crime Co-ordinators; Investigations Managers.

22.4. Australian Investigation Authority Responsible Officers

An Australian Investigation Authority Responsible Officers are permanent or acting line manager or section mangers of the requesting Agent.

23. SCHEDULE 3 AUTHORISED PERSONS

23.1. The Lord Mayor

Purpose: inspection of all facilities associated with the SSCP including files and ~~registers, but~~registers but not including viewing of recorded materials unless in the company of the Chief Executive Officer or a Responsible Officer.

23.2. Control Room staff

Purpose: monitoring Street Safety Cameras and City Security Operations.

23.3. Members of the Street Safety Camera Program Working Group

Purpose: safeguarding the integrity of the overall SSCP and ensuring confidentiality and privacy protections are maintained.

23.4. Approved systems contractors

Purpose: to carry out system repairs and maintenance.

23.5. Approved cleaning contractors

Purpose: cleaning of the control room.

23.6. Approved technical / IT staff

Purpose: non-CCTV IT system maintenance.

23.7. Internal Audit Unit

Purpose: carrying out biennial audit program and follow up activities

In the event of an incident, all non-essential 'authorised persons' will be asked to leave the control room.

24. SCHEDULE 4 FORMS

Form 1 – No longer in use

Form 2 - ~~Application to view or obtain a copy of recorded material by a person other phan a member of the NSW Police~~No longer in use

Form 3 - Application to view or obtain a copy of recorded materials by a Member of Australian Law Enforcement Agency or Investigation authority~~the NSW Police~~

Form 4 - Application Response

Form 5 – No longer in use

Form 6 - Application for the Destruction of Recorded of Recorded Materials

25. SCHEDULE 5 SYSTEM AND CAMERA ANALYTICS

25.1. Introduction

The City of Sydney seeks to transform the services of the Street Safety Camera Program to make it more efficient, proactive and adapted to the needs of the public, by streamlining internal processes and supporting decision making by introducing Camera and System Analytics (CSA).

The City acknowledges that the introduction of such systems carries risk, so it is essential to ensure that its implementation introduces mechanisms to safeguard and guarantee fundamental human rights.

The design and implementation of CSA will be caried out in a proportionate, supervised and substantiated manner, with appropriate ethical and technical standards which encourage participation and deliberation with the public and impacted communities human rights front of mind.

The City of Sydney will provide general information on Artificial intelligence (AI) used in CSA, including information of what it is, how it is used in decision making, its benefits, how its risks are being mitigated, and the role and extent that AI plays in decision making processes for SSCP staff.

25.2. Purpose

25.2.1. The introduction of SCA, a form of AI automatically deriving meaning from the SSCP video feed, will be either built into the camera operation or additional add-on software/systems. CSA will, through the use of data analysis, statistics or self-learning logic, make automated predictions or decisions or give advice that may impact the public.

25.2.2. The purpose of using CSA is to assist with the identification of suspicious activities and aid in the searching of people of interest wanted in relation to crime committed, with such purpose being limited to the purposes of the SSCP as set out in section 5 of the Code of Practice. In specific terms, the purpose is to identify and alert City of Sydney Control Room staff to unusual behaviour, streamline response times and reduce time spent searching footage when reviewing application by Police.

25.2.3. CSA must be suitable for its intended purpose and have capacity to make correct decisions (classify correctly), be safe, reliable and robust.

25.2.4. City of Sydney will ensure that the CSA is explainable; that is, that automated and algorithmic decisions and any associated data driving those decisions can be explained to the public and other stakeholders in non-technical terms. This may be achieved by incorporating descriptions and system technical specifications documentations, demonstrating accountability to the public and other stakeholders.

25.3. Ban on Biometric identification systems

25.3.1. Section 1.4 of the Code of Practice states that any camera software analytic technology used will not involve the use of biometric identification systems including facial recognition systems, that is, for the automatic recognition of human features in public spaces.

25.4. Robust systems

25.4.1. The City of Sydney will ensure that deployment models are sufficiently robust, safe and secure and will contribute towards building trust in the CSA. In this case, robustness refers to the ability of a CSA to cope with error during execution and erroneous input and is assessed by the degree to which it or a component can function correctly in the presence of invalid input or stressful environmental conditions.

25.4.2. Designers/systems integrators and Control Room Staff are responsible and accountable for CSAs applications and algorithms, and to ensure that it operates in a transparent and fair manner.

25.4.3. CSA will be tested for the purpose of identifying the most appropriate and targeted risk management measures. Testing shall ensure that the CA performs consistently for its intended purpose and that it is in compliance with requirements using international standards or voluntary frameworks for trustworthy AI.

25.4.4. At the time if procurement, terms and conditions will detail what information third parties must provide about the AI used. The terns must include digital ethics policies and be transparent about the services proposed. In any event, at pretender stage, an algorithmic impact study will be conducted, describing what the algorithmic system does and who is responsible in the event of a problem. City of Sydney must be able to verify whether the contactor complies with the requirements specified and the contractor will provide all the necessary data for an algorithmic audit.

25.4.5. City of Sydney will provide a general product description of the CSA so that consumers know how the AI-enabled features are expected to behave during normal use. The information could be provided in more detailed descriptions or specifications for product features in an Algorithmic Register.

25.5. Objections procedure

25.5.1. Clear and detailed information on the publics communication mechanisms will be available to process requests for information or queries, incidents, complaints and suggestions regarding the operation of the CSA.

25.5.2. The City of Sydney will provide an avenue for individuals to request an impartial review of material AI decisions that have affected them, though it will not be clear to the party objecting to the decision or the officer handling the objection what impact the algorithm had on the decision. Where the effect of a fully autonomous decision may be material, the decision will be reviewed by a responsible human in a timely manner.

25.6. Governance

25.6.1. Governance over the deployment of CSA encompasses, but not limited to, defined duties and responsibilities, the measures needed to avoid risks when using algorithms and the responsible party in case an algorithm does not meet its purpose.

25.6.2. Accountability

City of Sydney will ensure that Control Room Staff are responsible and accountable for the proper functioning of CSA and for the respect of AI ethics and principles, based on their roles and the context.

25.6.3. Human oversight

Human oversight of the CSA will be active and involved, with the human retaining full control and CSA only providing recommendations or input. Decisions cannot be exercised without affirmative action by the human, such as a human command to proceed with a given decision.

25.6.4. Appropriate oversight

Responsibility for and oversight of the various stages and activities involved in CSA deployment will be allocated to the appropriate personnel and/or departments, with a coordinating body, having relevant expertise and proper representation. In any event, in accordance with Section 13 of the Code of Practice, the City of Sydney, in consultation with the Audit Risk and Compliance Committee and the SSCP Working Group, will periodically monitor the operations of CSA.

Monitoring and reporting systems will be established as well as processes to ensure that the appropriate level of management is aware of the performance of and issues relating to CSA.

Risks that could arise and strategy for managing them in the interests of transparency, City of Sydney will ensure that, if manage occurs as a result of CSA operations, its cause can be traced, as well as to ensure understanding of the options and assumptions made and the categories of data used.

25.6.5. Data management

The recovery, modification or cancellation of any personal data, as well as the opposition or limitation of some of its processes will be considered where necessary. Data destruction will take place in accordance with section 17.2.2 of the Code of Practice.

25.6.6. Fairness

25.6.7. City of Sydney will ensure that;

i) CSA does not create discrimination or unjust impact across different demographic lines (e.g. race, sex, etc.),

ii) It will develop and include monitoring and accounting mechanisms to avoid unintentional discrimination when implementing SCA, and

iii) It consults a diversity of voices and demographics when developing CSA

25.7. Audit

25.7.1. An audit verifies that the appropriate measures are in place to prevent risks, such as those of discrimination or a violation of rights and will ensure accuracy of CSA

25.7.2. There shall be an annual report on the use of CSA to establish whether a correct risk management strategy is being carried out and governance practices and processes are in line with evolving AI standards. The outcome of such evaluations will be made available to the public.

25.7.3. Datasets (including training, testing, and validation datasets) will be reviewed periodically to ensure accuracy, quality, currency, relevance, reliability and to eliminate bias.

25.7.4. Detailed records of design processes and decision-making will be kept.

25.8. Algorithmic impact assessment

25.8.1. Continuous risk assessment will take place in the form of algorithmic impact assessment (AIA), encouraging continuous best practices. The AIA will form part of the Annual Audit.

25.8.2. The AIA facilitates external experts to review, audit and evaluate CSA using methods that allow them to identify and detect failures or problems.

CITY OF SYDNEY